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Eric J. Riso, Esq. ZELLER & WIELICZKO, LLP 120 Haddontowne Court Cherry Hill, NJ 08034

RE:

Eric D. Blanding vs. Borough of Woodlynne, et als.

No.: 1:20-cy-20481-RBK-AMD

Dear Mr. Riso:

Plaintiff hereby supplements and/or amends his answers to Defendant's discovery requests by naming Patrolman Maurice Lewis of the Winslow Twp. Police Department as Plaintiff's liability expert, who may be called to testify at the time of trial with respect to all facts at issue.

His testimony shall be based upon all facts, those supplied in discovery and at trial, from records supplied by the Plaintiff and the Defendant, and those independently developed by this office as well as Defendant's expert(s).

Be advised that none of the attached documents should be viewed as an adoptive admission on the part of Plaintiff. See, <u>Skibinski v. Smith</u>, 206 <u>N.J. Super</u>. 319, 352-54 (App. Div. 1985); <u>also, Sallo v. Sabatino</u>, 146 <u>N.J Super</u>. 416, 418-19 (App. Div. 1976).

I assume you will have no objection to this form of amendment unless I hear from you to the contrary within five (5) days.

Thank you.

MITCHELL LEE GOLDFIELD

MLG/nt Enclosures